

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:	)	BK. NO. 24-40384
	)	
WILLIE LANE SHANNON, JR.	)	CHAPTER 13
SSN: ###-##-9262	)	
LAURA M. SHANNON	)	
SSN: ###-##-9249	)	
	)	
Debtors.		

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN (Doc 48)**

COMES NOW, ERIN M. MCCARTNEY, Chapter 13 Trustee, and objects to confirmation of the plan pursuant to 11 U.S.C. § 1324 and Neb. R. Bankr. P. 3015-3(B) for the following reason(s):

1. The claim filed by the Internal Revenue Service suggests the Debtors have not filed all required returns for 2021.
2. The claim filed by the Nebraska Department of Revenue suggests the Debtors have not filed all required returns for 2021.
3. The amended plan does not provide treatment for the secured claim filed by the Nebraska Department of Revenue.
4. The amended plan does not provide treatment for the secured claim filed by Wells Fargo Bank, N.A.
5. It appears the Debtor's income on Schedule I is understated based on additional awards/bonuses received by the Debtor.

WHEREFORE, Trustee prays that the Trustee's Objection to Confirmation be sustained.

DATED: October 29, 2024

s/ Erin M. McCartney  
Erin M. McCartney #23663  
Chapter 13 Trustee  
13930 Gold Circle, Suite #201  
Omaha, NE 68144  
(402) 697-0437  
1-800-884-0437

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the Trustee's Objection was served on CHRISTOPHER J GAMM, debtors attorney, via the CM/ECF system of the United States Bankruptcy Court and a copy was mailed on October 29, 2024, by first-class, U.S. mail, postage prepaid to the Debtors at the addresses listed below:

WILLIE LANE SHANNON, JR.  
7548 WHITLOCK PLACE  
LINCOLN, NE 68516-5786

LAURA M. SHANNON  
7548 WHITLOCK PLACE  
LINCOLN, NE 68516-5786

s/ Erin M. McCartney  
Erin M. McCartney